

### III. REMARKS

Claims 1-26 remain pending. Claims 1-6, 9-11, 13-16, 18-23 and 26 are rejected under 35 USC 102 as being allegedly anticipated by Angel et al., US 2002/0133392 A1 (Angel). Claims 7-8, 12, 17, and 24-25 are rejected under 35 USC 103(a) as allegedly being unpatentable over Angel in view of Pope et al., US 2003/0055737 A1 (Pope). Applicant has herein amended claims 1 and 18. No new matter is believed added.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

With regard to independent claim 1 (and similarly claim 18), Applicant submits that Angel fails to teach each and every feature presented in the claim. Initially, Applicant points out that Angel teaches a content steering engine (see, e.g., Figure 1) that is used to steer an end user to content in a distributed network to address an existing issue (i.e., it provides on-line customer support). Angel does not teach a case management system for managing customer cases. Angel merely provides a system for submitting queries and retrieving content from one or more disparate providers (see, e.g., claim 1).

Conversely, Applicant provides a system that can manage cases, and includes, *inter alia*, “a user interface that provides distributed access for customers and support providers to case information within the CRM system, wherein the user interface provides access to a customer case management page for viewing all cases opened for a given customer and a case summary page for viewing details of individual cases stored within the CRM system.” Thus, the claimed invention differs from Angel in that the claimed invention stores customers’ case details that can

be displayed via either a case management page or a case summary page. Angel provides a system for retrieving goods/services help content “distributed across various enterprises or entities” (see, e.g., para. 0007). Nowhere does Angel teach or suggest the concept of storing and viewing customer case information, as claimed in claims 1 and 18. For these reasons, Applicant submits that independent claims 1 and 18 are not anticipated by Angel.

Moreover, as recited in claim 10 (and similarly claims 1 and 18), the present invention provides “displaying a compliance indicator when the customer case management page is viewed.” The Office Action alleges that this feature is taught in paragraph 0087 of Angel, as “an exit node indicator on the customer session page.” Applicant respectfully traverses this interpretation of Angel. Nowhere does Angel teach or suggest displaying a compliance indicator. Paragraph 0087 of Angel merely states that the “HP printer concept in the Dell CRM content provider’s **knowledge map** would be designated an exit node” which would transfer the session to HP. Thus, the exit node only exists in the service provider’s knowledge map as a means for transferring the session from one web site to another service provider’s web site. Deciding that control of a session should be passed from one web site to another has nothing to do with tracking customer compliance, and no reasonable person could possibly interpret such a node in a map as a **compliance indicator**. In the Angel system, all customers who click on the link will be passed to a different web site, so the exit node cannot possibly indicate customer compliance.

The Office Action (with regard to claim 1) states that Applicant’s specification broadly defines the concept of a compliance parameter. However, Applicant does not claim “parameter” and further, even if, *arguendo*, one did interpret an exit node as a compliance indicator, nowhere does Angel teach displaying the exit node in a customer case management page. Instead, Angel

explicitly discloses a dialog that *seamlessly* transfers a user from one web site to another while the user looks to obtain help (see, e.g., para. 0081). In other words, a user of Angel's system is not even aware that a particular item in a dialog is going to send them to a different web site until after they click on the link. Thus, such an item cannot possibly, under any reasonable interpretation, be interpreted to indicate compliance. Accordingly, Applicant submits that for these reasons, claims 1, 10, 18 are not anticipated by Angel.

Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features. The secondary reference, Pope, fails to remedy the aforementioned deficiencies found in Angel.

Applicant respectfully submits that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,



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